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13 Settlement Class

14
15 **UNITED STATES DISTRICT COURT**
16 **SOUTHERN DISTRICT OF CALIFORNIA**

17 **PATRICIA CONNOR, AND**
18 **SHERI L. BYWATER,**
19 **INDIVIDUALLY AND ON**
20 **BEHALF OF ALL OTHERS**
21 **SIMILARLY SITUATED**

22 **PLAINTIFFS,**

23 **V.**

24 **JPMORGAN CHASE BANK**
25 **AND FEDERAL NATIONAL**
MORTGAGE ASSOCIATION A/
K/A FANNIE MAE,

26
27 **DEFENDANTS.**

28 **Case No: 10-CV-1284 GPC (BGS)**

CLASS ACTION

DECLARATION OF DOUGLAS
J. CAMPION IN SUPPORT OF
OPPOSITION TO OBJECTIONS
TO CLASS ACTION
SETTLEMENT

DATE: DECEMBER 4, 2014
TIME: 1:30 P.M.

THE HON. GONZALO P. CURIEL

DECLARATION OF DOUGLAS J. CAMPION

I, DOUGLAS J. CAMPION declare:

1. I, Douglas J. Campion, hereby declare I am one of the attorneys for the Plaintiffs in this action, and named as Class Counsel for the Settlement Class in the Court's March 12, 2012 Order preliminarily approving the settlement. I submit this declaration in support of the Plaintiffs' Opposition To Objections To Class Action Settlement.
2. I am licensed to practice law before this court and all California state courts and all federal courts located in the State of California. If called as a witness, I would competently testify to the matters herein from personal knowledge.
3. I am the principal of the Law Offices of Douglas J. Campion, APC and one of the counsel of record for Plaintiffs in this matter, appointed as Class Counsel in the Court's Preliminary Approval Order. I am admitted to this Court and have been a member in good standing of the State Bar of California for the past 37 years, since 1977.
4. After Objector John W. Davis assisted in discovering a portion of missing class data omitted from Group 1, Class Counsel addressed this objection, participating in a further search for those "Group 2" missing class members, and ultimately amending the settlement to include them and providing notice to the Group 2 class members. As a result, the Davis objections have been addressed and will no longer be asserted. Counsel for Davis and I have conferred and it was represented to me that Davis will be filing a supplemental memorandum advising the Court his objections have been satisfied, and if viewed as still pending, are withdrawn.
5. Attached hereto as Exhibit 1 is a true and correct copy of the objection received from Jenkins-Blaney.
6. Attached hereto as Exhibit 2 is a true and correct copy of the objection received from Jose Herrera.

- 1 7. Attached hereto as Exhibit 3 is a true and correct copy of the objection
- 2 received from Carmen Vara.
- 3 8. Attached hereto as Exhibit 4 is a true and correct copy of the objection
- 4 received from Shabina S. Debbie.
- 5 9. Attached hereto as Exhibit 5 is a true and correct copy of the objection
- 6 received from Smith-Norman.
- 7 10. Attached hereto as Exhibit 6 is a true and correct copy of the objection
- 8 received from Curtis Williams.
- 9 11. Attached hereto as Exhibit 7 is a true and correct copy of the objection filed
- 10 by class member Berry.
- 11 12. Attached hereto as Exhibit 8 is a true and correct copy of the objection
- 12 received from Tammy Rodriguez.
- 13 13. Attached hereto as Exhibit 9 is a true and correct copy of the objection filed
- 14 by Stephen and Cheryl Kron. Shortly thereafter, Cheryl Kron's objection was
- 15 withdrawn.
- 16 14. Attached hereto as Exhibit 10 is a true and correct copy of purported
- 17 objection and request for a continuance filed by class member Robert
- 18 Michener.
- 19 15. Attached hereto as Exhibit 11 is a true and correct copy of the response
- 20 received from class member Michener after Class Counsel sent
- 21 correspondence requesting clarification if he wished to make a claim, object
- 22 or opt out.
- 23 16. Attached hereto as Exhibit 12 is a true and correct copy of the short form
- 24 notice and claim form for Group 1.
- 25 17. Attached hereto as Exhibit 13 is a true and correct copy of the short form
- 26 notice and claim form for Group 2.

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San Diego, California

1 18. Attached hereto as Exhibit 14 are true and correct copies of the relevant
2 pages of the deposition transcript cited in the brief of objector Stephen A.
3 Kron taken in this matter.

4 I declare under penalty of perjury that the foregoing is true and correct.
5 Executed on November 4, 2014 at San Diego, California, pursuant to the laws of
6 California and the United States.

7 /s/ Douglas J. Campion
Douglas J. Campion

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